

HARRIS BEACH MURTHA
ATTORNEYS AT LAW

February 12, 2025

445 HAMILTON AVENUE, SUITE 1206
WHITE PLAINS, NEW YORK 10601
914.683.1200

VIA SDNY ECF

Hon. Philip M. Halpern
United States District Court, Southern District of New York
300 Quarropas Street, Courtroom 520
White Plains, New York 10601

DARIUS P. CHAFIZADEH
MEMBER
DIRECT: (914) 683.1212
FAX: 914.683.1210
DCHAFIZADEH@HARRISBEACHMURTHA.COM

**Re: *JCCA v. Carl Fulgenzi and the Town of Mount Pleasant*
SDNY Civ. Case No.: 24-cv-02580 (PMH) (VR)**

Dear Judge Halpern:

This firm represents Defendants Carl Fulgenzi as Supervisor and Chief Executive Officer of the Town of Mount Pleasant (“Supervisor Fulgenzi”) and the Town of Mount Pleasant (the “Town”) (collectively, “Defendants”), in the above-referenced action. We write pursuant to Rule 1(C) of the Court’s Individual Practices to respectfully request an adjournment of the pre-motion conference currently scheduled for February 19, 2025 as I will be out of the office on a pre-planned family vacation next week.

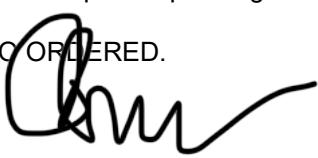
This is Defendants’ first request for an adjournment of the pre-motion conference and Plaintiff’s counsel has consented to the requested adjournment. We have conferred with Plaintiff’s counsel, and we are both available the following week on February 27 and 28 (Plaintiff’s counsel has informed us they are unavailable February 24-26).

Thank you very much for the Court’s time and consideration of this request.

Application granted. The February 19 pre-motion conference is adjourned to March 5, 2025 at 9:30 a.m.

The Clerk of the Court is respectfully directed to terminate the letter sequence pending at Doc 31.

SO ORDERED.


Philip M. Halpern
United States District Judge

Dated: White Plains, New York
February 12, 2025

RESPECTFULLY SUBMITTED,

HARRIS BEACH MURTHA CULLINA PLLC

/S/ *Darius P. Chafizadeh*

DARIUS P. CHAFIZADEH